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Federal Communications Commission
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MAY 16 1997

Office of Secretary

In the Matter of

Amendment of the Commission's Rules
Regarding Multiple Address Systems

)
)
)
) WT Docket No. 97-81
)

**REPLY COMMENTS OF
ARCH COMMUNICATIONS GROUP, INC.**

Pursuant to Sections 1.415 and 1.419 of the Commission's rules, 47 C.F.R. §§ 1.415 and 1.419, Arch Communications Group, Inc. ("Arch"),¹ by its attorneys, hereby submits these Reply Comments in response to the Commission's Notice of Proposed Rule Making in the above-captioned docket.²

Arch is the third largest provider of paging services in the United States, and utilizes numerous frequencies in the 928/959 MHz band to control its paging base station transmitters.³ As an incumbent licensee, Arch supports the Commission's conclusion that incumbent operations in the 928/959 MHz band should be protected and that incumbents should be allowed to modify

¹ Arch is a nationwide paging carrier and a leading provider of paging services with over 3 million pagers currently in service. Arch operates in more than 40 states, and in 80 of the 100 largest markets in the United States.

² *In the Matter of Amendment of the Commission's Rules Regarding Multiple Address Systems*, WT Docket No. 97-81, Notice of Proposed Rule Making, 62 Fed. Reg. 11407 (March 12, 1997).

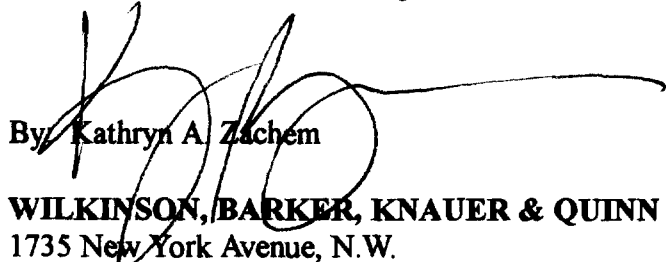
³ Arch operates on 928.8625 MHz, 928.9625 MHz, 928.9125 MHz, 928.9875 MHz, 928.8875 MHz, 928.9375 MHz, 933.78 MHz, 933.18 MHz and 942.78 MHz. As Arch noted in its Comments filed May 1, 1997, Arch has also filed a substantial number of applications for 932/941 MHz multiple access control channels for use as intermediary links in its paging networks. These applications remain pending.

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their existing systems and add new transmitters. Arch also supports the Commission's proposal to extend operational flexibility to incumbents by allowing them to continue using the 928/959 MHz frequencies for control purposes on a primary basis or to provide mobile services on a co-primary basis. In this regard, Arch supports, in part, the comments filed by Affiliated American Railroads, Bristol Babcock, Inc., East Bay Municipal Utility District, GTECH Corporation and ProNet, Inc. wherein these parties concurred with the Commission's proposals to fully grandfather incumbent operations and allow them to continue operating under their current authorizations.⁴

Respectfully submitted,

Arch Communications Group, Inc.

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May 16, 1997

⁴ Comments of Affiliated American Railroads at 5-7, Bristol Babcock, Inc. at 3, East Bay Municipal Utility District at 6-7, GTECH Corporation at 6-7 and ProNet, Inc. at 8-9.

CERTIFICATE OF SERVICE

I, Joy Griffiths, do hereby certify that I have, on this 16th day of May, 1997, caused to be served by first class U.S. mail, postage prepaid, a copy of the foregoing Reply Comments to the following:

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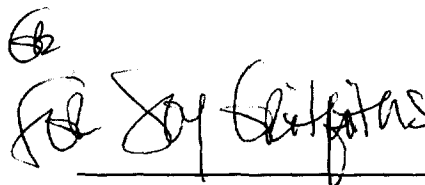
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